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## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## PRP START INITIAL POLREP

## I. HEADING

DATE: June 3, 1997

FROM: Paul Steadman, OSC, U.S. EPA, Region V, ERB, RS-III

TO: D. Dietrich/Attn: K. Mould, US EPA, Wash DC.. (VIA FAX)  
R. Karl, US EPA, ERB, Chicago, IL..... (VIA FAX)  
✓ F. Rollins, US EPA, ERB, RS-III, Chicago, IL. (VIA FAX)  
W. Messenger, US EPA, ERB, ESS, Chicago, IL.. (VIA FAX)  
— A. Lilly, ESS, US EPA, , Chicago, IL..... (VIA FAX)  
J. Cahn, US EPA, ORC, Chicago, IL..... (VIA FAX)  
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K. Moore, US EPA, TSCA, Chicago, IL..... (VIA FAX)  
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K. Clouse, OEPA ERSIS/DERR, Columbus, OH..... (VIA FAX)  
T. Buchan/D. Jancuk, OEPA, Columbus, OH..... (VIA FAX)  
D. Hall, City of Dayton, OH..... (VIA FAX)  
U.S. Coast Guard, 9th District..... (VIA FAX)  
U.S. Fish & Wildlife, Lansing, MI..... (VIA FAX)

SUBJECT: GHR Foundry Site, Dayton, Montgomery County, Ohio  
Responsible Party Removal Action

POLREP No: Initial

## II. BACKGROUND

SITE ID: A539  
RESPONSE AUTHORITY: CERCLA  
NPL STATUS: No  
START DATE: 05/21/97  
AOC DATE: 02/25/97

## III. SITE INFORMATION

The GHR Foundry (GHR) Site is an abandoned former grey iron castings foundry occupying approximately 12 acres at 400 Detrick Street. The Site is located near the confluence of the Mad and Miami Rivers on the northeast side of Dayton, Montgomery County, Ohio. The GHR Site was in operation from at least 1946 until early in the year 1983.

Subsequently in 1988 the Site was known by various names including The Ohio Industrial Trading Company, John Paul Enterprises, Inc., and Foundry Sales & Supply, Inc. Land usage shifted from strictly industrial to area use involving salvaging and recycling operations to recover copper and other recyclable or reusable scrap metals from large electrical transformers and capacitors. As a result of

this activity uncontrolled disposal of polychlorinated biphenyls (PCBs) on-site occurred presenting and increasing a serious threat to public health and the environment.

In addition to PCBs, large volumes of asbestos, pressurized gas cylinders, mixed demolition and industrial wastes, including drummed ignitable liquids and semi-solids, were dumped or improperly stored on-site as determined by site investigations and assessments conducted on April 10 and October 15, 1996. Also, six underground storage tanks (USTs) with capacities ranging from 2,000 gallons to 20,000 gallons containing liquids and semi-solids were found to be located within the northern third of the Site.

Beginning in 1991 OEPA commenced a series of PCB compliance inspections of the GHR Site for engaging in PCB waste handling activities after February 5, 1990. These inspections resulted in the U.S. EPA conducting a Determination of Compliance with the PCB Rule (40 CFR, Pt. 761) Inspection of the GHR Site on June 17, 1991. The results of that inspection disclosed that a sufficient basis for issuance of a 20 count complaint, ranging from improper storage and marking of PCBs to improper use and disposal, against the respondents for violations of the PCB Rule existed. On May 3, 1996 a TSCA Violation Complaint (Docket No. 5-TSCA-96-002) was filed against the respondent organizations and PRPs in this action.

On September 11, 1996 a General Notice of Potential Liability letter (Sec. 107a) concerning CERCLA violations was sent to the PRPs. The PRPs did not respond with any intention to comply until on or about January 21, 1997 when they were represented by counsel. Agreements by the PRP respondents in this action, Foundry Sales & Supply, Inc., were made to undertake certain and specified response actions to remove the release and threat of release of the contaminants from this Site. As a result of these agreements and negotiations an Administrative Order by Consent (Docket No. V-W-97-C-388) was entered into and issued February 25, 1997.

#### **IV. RESPONSE INFORMATION**

##### **1) Situation**

On March 5, 1997, the PRPs' contractor (Roy F. Weston, Inc. of Cincinnati, Ohio) submitted a draft work plan for EPA's review which specified their statement of work to conduct a removal action at the GHR Site. Such removal activities included the sampling and disposal of all PCB contaminants and their containers within the site; identification and off-site disposal of all asbestos containing wastes and debris on the site; sampling of all drummed wastes and their contents for determination of disposal options; locating, delineation and sampling of 6 USTs in preparation for their content's disposal and their removal; and conduct of an extent of contamination survey of the overall site environs for any unidentified sources or types of hazardous waste contamination.

The U.S. EPA had a number of concerns and identified several deficiencies in the draft work plan, and prepared, with inputs from the OEPA and City of Dayton's environmental officials, and submitted comments to the work plan on April 9, 1997. A revised work plan which incorporates all of the state's, city's and EPA's concerns was received from Weston on April 24, 1997, and the U.S. EPA approved that work plan on April 29, 1997.

## **2) Actions Taken**

On May 21, 1997 the U.S. EPA and the PRP's contractors attended a pre-mobilization meeting at the GHR Site. Items discussed included site safety and health of workers, security and access restrictions, staging of drummed wastes and accessing of PCB containers, monitoring, ambient air and water environmental sampling and confirmation analysis, excavation activities to include UST locations and contents sampling, and procedures for asbestos removal and analysis.

On May 22, 1997 mobilization of Weston and its subcontractor for asbestos removal commenced and sampling of the unknown drums contents were underway.

## **3) Future Actions**

Asbestos removal, PCB container and drum staging and sampling activities are scheduled to continue through June 13, 1997 with EPA oversight provided by START personnel and/or the OSC.

Approximately 3380 ft<sup>3</sup> of asbestos material are to be removed including both the transite and friable asbestos containing material, 28-55 gallon capacity drums of unknown content are to be sampled, an estimated 2800 gallons of PCBs and PCB containing liquids are to be staged for disposal, the contents and volumes of 6 USTs will be determined and subsequently pumped from these vessels and prepared for disposal a RCRA-approved facility with the USTs then excavated and removed from the site. The project schedule prepared by Weston indicates a completion date for all hazardous waste removal activity to be July 31, 1997. The U.S. EPA and its START contractor will provide continuous oversight during all excavation and associated removal activities.

## **IV. COSTS**

No cost information has been generated to date; however, the U.S. EPA has it stipulated that cost recovery for its oversight expenses will be reimbursed by the PRPs.